

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA  
Plaintiff,

v.

PRCHOU, LLC; MUKADAS D. KURBAN;  
APAR PATAER; ABDUL R. DAWOOD;  
and MARIA E. DAWOOD  
Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 24-796

**NOTICE OF NO OPPOSITION TO  
PLAINTIFF'S MOTION TO DISMISS COUNTERCLAIMS**

Plaintiff, Travelers Casualty and Surety Company of America (the "Surety"), files this its Notice of No Opposition from the Defendants, PRCHOU, LLC; Mukadas D. Kurban; Apar Pataer; Abdul R. Dawood; and Maria E. Dawood (collectively, "Indemnitors"), to the Surety's Motion to Dismiss Counterclaims.<sup>1</sup> In support, the Surety respectfully states as follows:

On June 28, 2024, the Surety filed a motion seeking a dismissal of the counterclaims asserted by the Indemnitors. Pursuant to Local Rule 7.4, the Indemnitors had until Friday, July 19, 2024, to file responsive briefing. *See also* Local Rule 7.3 (submission date is "21 days from filing without notice from the clerk."). The Indemnitors have elected not to file a response in opposition to the motion of the Surety. Accordingly, under the local rules, "[f]ailure to respond to a motion will be taken as a representation of no opposition." Local Rule 7.4.

---

<sup>1</sup> Dkt. 16

**REQUEST FOR RELIEF**

For the foregoing reasons, the Surety requests that the Court grant its motion to dismiss the counterclaims of the Indemnitors, detailed further in docket entry No. 16. The Surety prays for such other and further relief, both at law and in equity to which it may be justly entitled.

Respectfully submitted,

**BAINS LAW PLLC**

By: /s/ Brandon K. Bains

Brandon K. Bains – Attorney in Charge

State Bar No. 24050126

S.D. Texas Bar No. 711977

P.O. Box 559

Azle, TX 76098

Telephone: (214) 494-8097

[brandon@bainslaw.com](mailto:brandon@bainslaw.com)

**ATTORNEY FOR TRAVELERS CASUALTY  
AND SURETY COMPANY OF AMERICA**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing has been served pursuant to Federal Rules of Civil Procedure upon the following counsel of record on this the 25<sup>th</sup> day of July, 2024:

Minh-Tam (Tammy) Tran  
**THE TAMMY TRAN LAW FIRM**  
4900 Fournace Place, Suite 418  
Bellaire, Texas 77401  
832-372-4403  
[ttran@tt-lawfirm.com](mailto:ttran@tt-lawfirm.com)  
*Counsel for PRCHOU, LLC, Mukadas D. Kurban, and Apar Pataer*

D. John Neese, Jr.  
Texas Bar No. 24002678  
Samuel B. Haren  
Texas Bar No. 24059899  
**MEADE NEESE & BARR LLP**  
2118 Smith Street  
Houston, Texas 77002  
(713) 355-1200  
[jneese@mnbllp.com](mailto:jneese@mnbllp.com)  
[sharen@mnbllp.com](mailto:sharen@mnbllp.com)  
*Counsel for Abdul R. Dawood and Maria E. Dawood*

/s/ Brandon K. Bains

Brandon K. Bains